

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JUAN JOHNSON,)	
)	
Plaintiff,)	05 C 1042
)	
v.)	Judge Grady
)	
REYNALDO GUEVARA, and the)	
CITY OF CHICAGO,)	
)	
Defendants.)	

**PLAINTIFF'S STATEMENT OF FEES AND COSTS
PURSUANT TO LOCAL RULE 54.3 AND 42 U.S.C. § 1988**

Pursuant to Local Rule 54.3(e) and 42 U.S.C. § 1988, Plaintiff, by his counsel, submits the following Statement with respect to the motion for fees and costs filed by Plaintiff.

1. Movant claims attorneys' fees and costs of \$1,300,000 in this litigation. This amount includes all fees, costs, and expenses. The fees are those expended over the past five years of litigation, including investigation and initiation of the case, written discovery, expert discovery, taking/defending depositions, motion practice, pre-trial preparation, trial, and post-trial activities.

2. In the interest of avoiding further expenditure of attorneys' fees in litigating the appropriate amount of the attorneys' fees and costs, the City will not contest an award of \$1,300,000 in fees and costs.

3. There are no remaining fee or cost related disputes between the parties.

4. Plaintiff's motion is based on a judgment which Defendants have appealed, but which appeal has been (or soon will be) dismissed pursuant to settlement.

RESPECTFULLY SUBMITTED,

/s/ Jon Loevy

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